



Electric Power Marketing EIS Update for the Salt Lake City Area Integrated Projects

July 8, 1993

Western makes available EIS Implementation Plan

In accordance with Department of Energy guidelines, Western is making available to interested parties the Electric Power Marketing EIS Implementation Plan.

The Implementation Plan serves two purposes: (1) to provide guidance for the preparation of the EIS, and (2) to record the results of the scoping process. The guidelines further require that the plan be made available before issuing the draft EIS.

The plan includes several important features that have been discussed in previous *EIS Updates*: the Statement of Scope, Purpose & Need statements, summary of scoping activities, and the EIS schedule.

Western will make this available to interested parties through its Salt Lake City Area Office. Anyone interested in receiving a copy of the Implementation Plan or previous *EIS Update* newsletters may call Sharon Cook at (801) 524-5702.

Scoping meetings scheduled for transmission project EIS

Western has scheduled 11 public scoping meetings to be held in August for the Navajo Transmission Project (NTP) EIS. Western will act as the lead federal agency for the project's environmental activities.

Western is participating in the project with Diné Power Authority, an enterprise of the Navajo Nation in planning for the proposed project. NTP, as proposed, will be a 500 kilovolt alternating current transmission line with

Electric Power Marketing EIS delayed

Western has announced a change in its Electric Power Marketing EIS schedule. Changes in the schedule for the Glen Canyon Dam EIS and additional review time for the Cooperating Agencies have delayed release of the draft EIS about three months.

This places public release of the draft EIS for January 1994. Western will then conduct a 90-day comment period for interested parties to review the document and submit com-

ments. Public hearings on the draft EIS will also be scheduled for this timeframe. Western will publish a *Federal Register* notice to announce the exact dates and locations of the public hearings.

Western appreciates your patience in this very structured and detailed process. We appreciate your comments and encourage interested persons and organizations to stay involved in each of the EIS's public involvement activities.

EIS Schedule

Activity Schedule

Activity Schedule	Tentative Completion Date
Draft EIS Release	January 1994
Draft EIS 90-day Comment Period & Hearings	April 1994
Final EIS Release	December 1994
Final EIS Mandatory Comment Period	January 1995
Record of Decision Release	After January 1995

a capacity of 1,200 megawatts.

The eastern end of the project would be located in the Four Corners region of New Mexico and Arizona, and will join at the western end at Marketplace Substation about 11 miles southeast of Las Vegas. The EIS will also evaluate possible interconnection points at locations in north-central Arizona.

Western is developing a mailing list

of persons interested in receiving information and periodic updates for the project's environmental activities. Anyone interested in being added to the mailing list may write to:

Michael G. Skougard
NTP Environmental Coordinator
Western Area Power Administration
P.O. Box 11606
Salt Lake City, UT 84147-0606



Western Area Power Administration

• Salt Lake City Area Office

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Electric Power Marketing EIS Update for the Salt Lake City Area Integrated Projects

November 20, 1992

Western Responds to Alternatives Comments

This issue of the *EIS Update* deals with Western's responses to comments received on proposed EIS alternatives and a delineation of the final EIS alternatives for the SLCA/IP Electric Power Marketing EIS. Also covered is the treatment of the Aspinall facility in light of recent decisions and announcements by the Bureau of Reclamation. Western's decisions on these issues are important for the satisfactory completion of our EIS.

CONSIDERATION OF COMMENTS

Western's Salt Lake City Area office hosted five public meetings discussing the proposed EIS alterna-

tives during the first week of June. These meetings were held in Salt Lake City, Utah; Flagstaff and Phoenix, Arizona; Albuquerque, New Mexico; and Denver, Colorado. For the most part, the meetings were well-attended and there was active public participation at each of the presentations.

Western received 30 written comments by the close of the comment period, July 10, 1992. These comments were useful. They will enhance the EIS and Western's final decision on marketing SLCA/IP Electric Power.

Rather than deal with a lengthy discussion of each comment, this *EIS*

Update highlights our responses to comments which need clarification or have resulted in modifications to the alternatives.

RESPONSE TO COMMENTS

Certain comments caused us to adjust our approach. Others have caused us to reevaluate our analysis to ensure it complies with our stated purpose. And some made us better describe our approach and analysis.

This summary is based on specific comments which are grouped and restated for purposes of this discussion. The summary begins on Page 2.

TABLE 1

Electric Power Marketing EIS Commitment-Level Alternatives

Alternative Number	Operation Type	Power Commitment (MW)	Energy Commitment (GWh)	Load Factor (percent)	Description
No Action		1,291	5,700	50	The 1978 marketing program commitment level — lower capacity and high energy levels.
1		1,449	6,156	48.5	Originally the <u>Proposed Action</u> alternative with high power and energy commitment levels.
2	Peaking	1,450	3,300	26	The highest peaking alternative with a high power commitment, but a low energy commitment.
3		1,225	4,000	37	Risk of supply is lessened with lower power and energy commitment levels.
4		550	3,300	68	The lowest supply risk commitment levels.
5	Base Load	625	5,475	100	The alternative that provides the energy equivalent of generation at a steady mode of power plant operation.
6		1,000	4,750	54	A moderate level of supply risk alternative.

Comment #1

Electrical Energy Conservation:

- a. Include conservation in most or all alternatives.
- b. Conservation affects demand for electricity and subsequently, how the dams are operated.
- c. Include Energy Planning And Management Program (EPAMP) EIS as an integral part of the Marketing EIS.

Western will include in its analysis the effect of conservation on the use of electricity sold by Western. Whatever influence Western's commitment level alternatives have on its customer's conservation programs and subsequently, on dam operations, will be quantified and reported.

EPAMP's purpose is to provide long-term Federal electrical energy stability and certainty to Western's

customers while requiring customer preparation of Integrated Resource Plans. Alternatives have been presented and a preferred alternative is being proposed.

The Energy Planning portion of EPAMP is expected to be adopted into the marketing of the firm power and energy in the Salt Lake City Area through incorporation into the firm power contracts. Since the EPAMP EIS is scheduled to be

completed prior to the Marketing EIS, the possible impacts and benefits associated with the Energy Management program portion of EPAMP will be recognized and incorporated into the Marketing EIS.

Persons interested in EPAMP may contact Western staff at the address on the bottom of page 5 for further information.

Comment #2

Operation of the Crystal (Aspinall) Reservoir/powerplants:

The no-action operational option appears to imply that there are no constraints on the operation of this facility.

In fact, there are limitations on the changes in the elevation of the reservoir.

Western agrees. We did not mean to imply that there were no constraints. Rather, we were describing the limitations on

operations only with regard to minimum flows, maximum power plant capacity, and ramp rates. A

larger issue related to Aspinall is discussed in this *EIS Update*. Please see the discussion on Page 6.

Comment #3

Operational options for Flaming Gorge Dam

- a. Western should examine operations at Flaming Gorge beyond just those related to endangered fish impacts.
- b. The analysis should include an operational regime similar to that which was proposed by the Utah Division of Wildlife Resources.

Of the four operational regimes proposed for Flaming Gorge, three are constructed within compliance of the Draft Biological Opinion issued to Western and Reclamation by the U.S. Fish and Wildlife

Service. These three span the range of possible powerplant operation from highly fluctuating to steady flows. All environmental and recreational resources impacted by various powerplant operations are

being analyzed. The moderate fluctuation option was fashioned, in part, after discussions with the State of Utah biologists regarding fishing below the dam.

Comment #4

Commitment Level Alternatives:

The commitment level alternatives are all "high." Some of Western's alternatives should be in the lower end of reasonability.

The lowest of Western's proposed commitment level alternatives (see Alternative #4) is based on the amount of capacity and energy available from the SLCA/IP power

plants in the driest month of an adverse year and assumes that all applicable powerplants are baseloaded. This is the lowest level

of power and energy that can be reasonably committed to and marketed consistent with sound business principles.

Comment #5

Contract Term:

The term of the contracts should be shortened and staggered so that Western will have the flexibility to adjust to future unforeseen limitations on operations of the SLCA/IP powerplants.

Western has the ability to adjust to limitations in operations of SLCA/IP powerplants through its purchases of supplemental power. In addition, Western has included within its firm power contracts a provision to modify

them as a result of the Marketing EIS, the Glen Canyon EIS, the Recovery Implementation Program, and by order of the court. Finally, the contracts provide for possible changes in contract

commitments in 1999. This provision was added with the express purpose of giving Western the flexibility of dealing with possible changes in resource supplies.

Comment #6

Relationship(s) of the EIS to other Processes:

- What is the relationship of the Marketing EIS to the Glen Canyon Dam EIS, the Gunnison River EIS, and the Flaming Gorge Biological Opinion? Western's decision should be conditioned on the results of these processes.
- There appears to be no substantive formula for integrating the findings of other environmental processes ongoing at SLCA/IP facilities, EPAMP, and the Marketing EIS.

Each of Western's commitment level alternatives is comprised of two components; the power and energy available from the SLCA/IP facilities, and the amount of power and energy required from supplemental resources (purchases) necessary to meet the total commitment level. The economic analysis will predict the impact of making a commitment of power and energy with SLCA/IP resources fixed at various levels and the resulting difference in power and energy that would be acquired from other generation sources. In this way, the public and the Federal decision maker will be able to see and compare the impacts of the alternatives from both economic and environmental perspectives.

The commitment level alternatives encompass a range of power and

energy levels that take into account all probable outcomes of the other environmental processes. Western can decide the outcome of its Electric Power Marketing EIS prior to the decisions on the other processes. This will not be a problem since Western will have analyzed the range of all probable outcomes within its EIS.

This approach is necessary since Western must develop the Marketing EIS and identify the appropriate commitment level in a reasonable time frame. The outcome of each of the SLCA/IP environmental processes does have a bearing on the eventual outcome of the Marketing EIS.

Western has developed a formula for integrating the outcomes of the other processes. This formula "screens" the numerous variations to a manage-

able number by choosing variations which bracket the entire range of possibilities.

As an example, Reclamation is assessing at least eight alternatives in the Glen Canyon Dam EIS, and Western is proposing to assess four modes of operations at Flaming Gorge. This alone results in 32 (8X4) possible combinations of powerplant operations. This is without taking into account changes in Aspinall operations. Each combination of powerplant operations represents a different level of electric power resource. Coupling each level of power resource with each of the seven EIS commitment-level alternatives could create an unmanageable number of different variations in resource supplies and commitment levels.

Comment #7

Methodology:

- Western should take into account the effects of its alternatives on the Salt River Exchange Agreement and on the possible construction of the Glen Canyon-Kayenta Transmission line.
- Western's EIS should be thorough and take into account secondary economic impacts (for example, is the CRSP resource being priced out of the market? If so, what economic impacts would this have?)
- The Marketing EIS should compare the SLCA/IP firm power rate against the market rate for power.

The modeling that Western will perform for power resources will account for the Salt River Exchange. The possible construction of a

transmission line between Glen Canyon and points east is uncertain and somewhat speculative. Further, the possible construction of this line

is not connected to Western's decision to market SLCA/IP power. Western's construction activities will separately comply with NEPA.

TABLE 2

Operational Options to Support SLCA/IP Marketing Alts.

<u>Glen Canyon Dam</u>						
For these operational regimes, Western will incorporate the analysis performed by Reclamation in its EIS.						
<u>Aspinall</u>						
	Minimum Release	Maximum Release	Maximum Daily Fluctuation	Ramp Up	Ramp Down	Biological Opinion Compliance
<u>Flaming Gorge</u>						
No-Action	800 cfs	4,900 cfs	No Limit	4,100 cfs/hr	4,100 cfs/hr	NO
High Fluctuation	800 cfs	4,900 cfs	See below*	4,100 cfs/hr	4,100 cfs/hr	YES
Moderate Fluctuation	1,000 cfs	3,000 cfs	2,000 cfs	2,000 cfs/hr	4,100 cfs/hr	YES
Monthly Adjusted Steady Flows	Steady Flows — No Fluctuations			None	None	YES

* The Biological Opinion restricts daily fluctuations in the summer and fall seasons to approximately 2,000 cfs. The winter and spring seasons have no stated limits.

The EIS will include both direct and secondary economic impacts. Impacts on the SLCA/IP firm power rate will also be estimated and compared with the wholesale costs of

power from other utilities. In addition, the impacts on utilities' wholesale costs of electric power, utility customers' decisions regarding power suppliers, the retail rates

paid by the end users, regional economic variables, recreation, and the costs of doing business will be analyzed.

Comment #8

Cumulative Impacts:

How will the EIS handle Cumulative Impacts?

The Marketing EIS will consider two types of cumulative impacts: the impacts of development of Western's marketing program over a period of time, and the impacts resulting from the commitment level alternatives over a geographic area.

The first of these deals with the decisions that Western (and Recla-

mation) has made over time regarding the operation of the SLCA/IP facilities for power generation. Since it is impractical to recreate historic marketing decisions, Western will assess the impacts of current operations against the range of other operational regimes.

Once site specific impacts are

known, the second assessment determines whether various site-specific impacts have a cumulative environmental effect. This assessment will be based on power system modeling studies. These will take into account SLCA/IP powerplant operations as well as power purchases.

Comment #9

Specific Studies

- Assumptions and techniques for air quality analysis should be clearly specified.
- Western should not attempt to quantify impacts of its alternatives on "non-use" values (economic values ascribed to nonusers of a resource).

A description of all methodologies and analysis that Western is performing will be available at the time the draft EIS is released for public review. Western will consider

the effects of alternatives on non-use values. However, Western will not undertake extensive new data-gathering efforts. Western will

review existing information on the subject and make largely qualitative descriptions of possible non-use value impacts.

Comment #10

Process:

- a. Why such a long delay until the Draft EIS (Fall 1993)?
- b. Will there be other opportunities for public involvement during this time. The EIS Update should be published every other month to keep the public informed of what is happening.
- c. How will new information be incorporated into the Marketing EIS process?

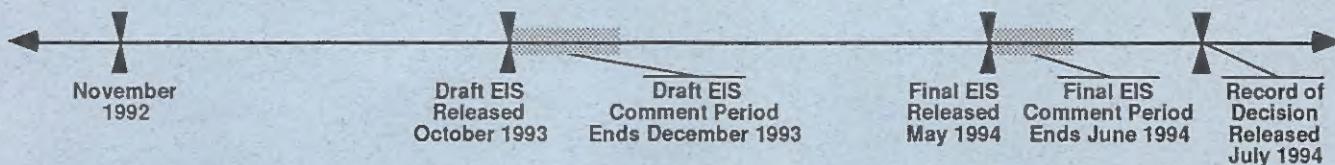
The development of any EIS requires time to acquire data, analyze impacts, write reports, review, and print. Our best estimate for completion remains the current schedule. At present, Western has scheduled no other public meetings on the EIS until the draft-EIS is released. This could change should there be significant new developments related to the EIS process or analysis.

Western publishes an *EIS Update* at significant stages in the EIS process. Usually, we do not have enough new information to publish the *EIS Update* every 2 months.

New information will be obtained and used as long as possible. But, at some point, Western must conclude the analysis and draft a document. NEPA allows for subsequent revi-

sions of the document as needed as a part of the process or even for revision of the decision.

The next scheduled opportunity for public comment on the EIS will be in Sept./Oct. 1993 with hearings on the draft EIS. You will be provided with suitable advance notice of the times and locations prior to those hearings.



Other Comments and Suggestions

Comments discussed here do not represent all comments Western received. However, each comment was carefully considered prior to decisions on changes to the EIS alternatives. Specific suggestions were not incorporated, for one or more of the following areas:

- a. The comment is out of scope or goes beyond the Purpose and Need for the Electric Power Marketing EIS.
- b. The comment is the result of an interpretation of acts, laws, or regulations.
- c. The comment is more appropriately aimed at some other NEPA or administrative process such as the Glen Canyon Dam EIS, the Energy Planning and Management Program

EIS, or the Western's rate setting process.
d. The comment is more appropriately aimed at some other Federal or state agency with administrative jurisdiction over the subject.
e. The comment does not reflect compliance with NEPA, the Colorado River Storage Project Act (CRSP), or other legal requirements.
f. The comment incorrectly interprets the presentation of alternatives. For example, one comment suggested that Western consider an alternative which should coincide with the most restrictive of Glen Canyon alternatives. Alternative No. 4 is based on the least amount of capacity available from all of the applicable facilities

under the worst set of conditions. The commentor's request is already included.

Western appreciates the time you took to write down your comments and send them to us for consideration. Your participation is an important part of the EIS process. We also encourage your comments concerning this *EIS Update*, as well as any future issues.

Alternatives originally described in the *EIS Update* of May 1, 1992, and described in Table 1 on the front page, form the basis for analysis in the SLCA/IP Electric Power Marketing EIS.

For more information on the EPAMP EIS...

Western staff are available to provide information on Western's Energy Planning and Management Program EIS. If you are interested in EPAMP, please contact Bob Fullerton, EPAMP EIS Project Manager, at the address

below:

Western Area Power Administration
Headquarters Office
P.O. Box 3402
Golden, CO 80401-3398

Reclamation to initiate Gunnison River EIS; Western to modify consideration of Aspinall options in Marketing EIS

The Commissioner of Reclamation announced on December 18, 1991, that Reclamation, the Bureau of Land Management, and the National Park Service would enter into formal negotiations on a water delivery contract to provide long-term protection of the Gunnison River through the Black Canyon of the Gunnison National Monument and through the Gunnison Gorge. Reclamation further announced that an EIS would be prepared on this proposed contract, but that during the preparation of the EIS, Reclamation would operate the Aspinall Dams according to the draft contract.

Since this announcement, Reclamation has expanded the scope of its EIS. Reclamation's EIS will now address the operation of the Aspinall Dams. The operation of the dams includes the operation of the powerplants at the dams. Western's plan, which was to examine various

operational options of the Aspinall powerplants, will be largely incorporated into Reclamation's Gunnison River EIS.

Western, therefore, has decided to modify its approach to the Aspinall power supply options as originally proposed. The Gunnison River EIS will examine the impacts of the alternative operations of the Aspinall units as specified by the draft contract and by the research flows for endangered fish species. The Marketing EIS will examine and

document the environmental impacts of powerplant operations over which Western will have influence regardless of the outcome of Reclamation's EIS. This basically consists of the hour-by-hour operations of powerplants upstream from Crystal Dam (restricted by a given monthly water volume).

Reclamation has invited Western to be a Cooperating Agency in its EIS. Western may also request that it be involved in the negotiation of the water delivery contract.

EIS Comments

Western welcomes your comments during this EIS Process. If you have any comments or questions about the EIS, please feel free to contact Dave Sabo, EIS Coordinator, at the following address:

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P.O. Box 11606
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